



NIH Division of the Fire Marshal

Administrative Interpretation 16-1

Equivalency Process

Code reference: Para. 1.4 of the Life Safety Code (2015 and future editions). Applicable to other NFPA codes and standards with equivalency clauses. Not applicable to waivers from NIH Design Requirements manual.

Background: Codes leave the details of the process to obtain an equivalency up to the AHJ.

Interpretation: Equivalencies must be obtained through the following process:

- Submit request to DFM in writing. Email is acceptable.
- ORF Director must be aware of request (signature, email copy, etc.).
- Request must include technical documentation.
- Technical documentation must include:
 - Prescriptive code reference.
 - Intent (goals and objectives) of that code requirement.
 - Alternate proposed design, including all compensatory protection features, procedures, materials, etc.
 - How the alternate design achieves equivalent or better life safety or protection.
 - Mathematical fire models and evaluation systems used to demonstrate equivalency may only be used within their defined purpose and stated limitations; all assumptions must be clearly identified. Prescriptive code-required features shall be used as a baseline for comparison to the alternate design.
 - Method or policy to ensure lasting compliance.
- Requests based on newer editions of codes must take into account all interrelated sections of the newer code.
- DFM will evaluate the request and respond in writing. Denials will include reason(s).
- DFM may require the requestor to obtain an independent third party review in accordance with Life Safety Code, para. 4.6.1.4. DFM may require the review to be performed by a registered design professional as per 4.6.1.4.3

Supersedes: N/A

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